

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**FEE APPLICATION COVERSHEET FOR THE PERIOD**  
**JUNE 1, 2023 THROUGH JUNE 30, 2023**

Debtor: LTJ Management LLC Applicant: Brown Rudnick LLP  
Case No.: 23-12585 (MBK) Client: Official Comm of Tak Claimants I  
Chapter: 11 Case Filed: April 4, 2023

**SECTION 1**  
**FEE SUMMARY**

☒ Monthly Fee Application No. 3 or ☐ Interim Fee Application No.     or ☐ Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2023 through June 30, 2023  
(the "Third Monthly Fee Statement")

Total Fees: \$3,454,944.50<sup>1</sup>  
Total Disbursements: \$121,677.77  
Minus 20% holdback of Fees (\$690,988.90): \$2,763,955.60  
**Total Amount Sought To Be Paid at this Time: \$2,885,633.37**

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE <sup>2</sup>	FEE
1. David J. Molton	Partner 1983	199.0	\$1,950	\$383,272.50
2. Jeffrey L. Jonas	Partner 1988	259.3	\$1,650	\$487,245.00
3. Michael S. Winograd	Partner 2001	363.6	\$1,280	\$465,408.00
4. Sunni P. Beville	Partner 2002	158.0	\$1,390	\$206,206.50
5. Cathrine M. Castaldi	Partner 1991	117.0	\$1,390	\$149,425.00
6. Barbara J. Kelly	Partner 1982	27.7	\$1,375	\$38,087.50
7. Eric R. Goodman	Partner 2003	163.1	\$1,325	\$198,750.00
8. Nicole M. Bouchard	Partner 2009	33.9	\$1,200	\$40,680.00
9. Cameron D. Moxley	Partner 2005	189.4	\$1,105	\$207,077.00
10. Susan Sieger-Grimm	Counsel 1994	206.5	\$1,055	\$211,422.00

<sup>1</sup> Brown Rudnick excluded fees in the amount of \$188,962.00 in respect of transient timekeepers and other voluntary reductions.

<sup>2</sup> Rates in this statement reflect the annual rate increase disclosed in our retention application.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE <sup>2</sup>	FEE
11. Gerard T. Cicero	Partner 2015	81.9	\$1,000	\$81,900.00
12. Shari I. Dwoskin	Partner 2014	137.9	\$1,025	\$135,402.50
13. Michael W. Reining	Associate 2015	119.0	\$955	\$113,645.00
14. Tia C. Wallach	Partner 2013	.9	\$955	\$859.50
15. Alexander F. Kasnetz	Associate 2018	164.6	\$890	\$144,046.50
16. Matthew A. Sawyer	Associate 2019	13.3	\$890	\$11,837.00
17. Jennifer M. Schein	Associate 2017	74.9	\$765	\$56,571.75
18. W. Lydell Benson, Jr.	Associate 2022	280.8	\$765	\$212,325.75
19. David Weinstein	Associate 2020	268.0	\$685	\$183,580.00
20. Thomas D. Rezach	Associate 2020	43.0	\$630	\$27,090.00
21. Harriet E. Cohen	Paralegal	31.1	\$490	\$15,239.00
22. Carlene M. Mercier	Paralegal	32.5	\$485	\$15,762.50
23. Madelyn A. Soliman	Paralegal	33.7	\$470	\$15,839.00
24. Jasnoor Hundal	Summer Associate	107.5	\$465	\$49,987.50
25. Jeannie Mendez	Paralegal	9.0	\$365	\$3,285.00
<b>TOTALS</b>		<b>3,115.6</b>		<b>\$3,454,944.50</b>

Fee Totals: \$3,454,944.50

Disbursements Totals: \$121,677.77

Total Fee Application \$3,576,622.27

**SECTION II SUMMARY  
OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.	0.0	\$0.00
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) <b>Case Administration</b> Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	20.0	\$9,692.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	4.7	\$4,823.00
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.	7.2	\$9,266.50
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) <b>Litigation</b> General litigation and other contested matters.	345.7	\$407,875.50
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings.	93.9	\$128,971.00
m) <b>Plan and Disclosure Statement</b> Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	262.4	\$294,587.00

SERVICES RENDERED	HOURS	FEE
n) <b>Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding</b> Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals.	19.0	\$23,337.50
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) <b>Valuation</b> Appraise or review appraisals of assets.	0.0	\$0.00
w) <b>Travel Time (billed @ 50%)</b>	116.6	\$74,229.50
x) <b>Committee Governance Matters</b> Analysis regarding committee governance matters, including creation of by laws and addressing other governance matters.	0.0	\$0.00
y) <b>Investigation and Due Diligence</b> Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) <b>Hearings</b> Preparation for and attendance at hearings.	255.9	\$321,678.50
aa) <b>Mediation</b> Preparation for and attendance at mediation.	15.2	\$28,515.00
bb) <b>Dismissal / Trustee / Examiner Matters</b> Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable.	1,962.2	\$2,134,420.50

SERVICES RENDERED	HOURS	FEE
cc) <b>Meetings of Co-Counsel</b> Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings.	12.8	\$17,548.50
<b>SERVICE TOTALS:</b>	<b>3,115.6</b>	<b>\$3,454,944.50</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	\$1,078.00
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$15,411.00
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	\$121.60
d) <b>Fax</b> Include per page fee charged.	\$0.00
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	\$0.00
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	\$3,009.20
g) <b>Outside Reproduction Services</b> Including scanning services.	\$11,155.91
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) <b>Court Reporting</b> Transcripts.	\$51,939.55
j) <b>Travel</b> Mileage, tolls, airfare, parking.	\$27,468.92
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	\$380.92
l) <b>Postage</b>	\$0.00
m) <b>Other (specify) Meals</b> Meals.	\$4,075.04
p) <b>Other (specify)</b> Expert Fees.	\$6,887.63
q) <b>Other (specify)</b> eDiscovery Hosting.	\$150.00
<b>DISBURSEMENTS TOTAL:</b>	<b>\$121,677.77</b>

I certify under penalty of perjury that the above is true.

Date: July 13, 2023

/s/ Sunni P. Beville

BROWN RUDNICK LLP (“Brown Rudnick”) submits this Third Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from June 1, 2023 through June 30, 2023 (“Third Monthly Fee Statement”), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the “Interim Compensation Order”).

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the Third Monthly Fee Statement in the sum of \$2,763,955.60, together with expenses of \$121,677.77, for a total requested payment of \$2,885,633.37, in accordance with the terms of the Interim Compensation Order.

Dated: July 13, 2023

**BROWN RUDNICK LLP**  
*Co-Counsel to the Official Committee  
of Talc Claimants*

By: /s/ Sunni P. Beville  
SUNNI P. BEVILLE